From: gec@glynnenvironmental.org
To: Scully, Pam
Cc: "Frank Anastasi"
Subject: GEC-Comments on LTM Plan
Date: Friday, September 24, 2021 4:33:22 PM
Attachments: OUI LTM Review Memo Final 091721.pdf

Ms. Scully,

Thank you for the opportunity to provide feedback on the Draft Long-Term Monitoring Plan (LTMP) that has been included in the 'Draft Pre-Final 95% Remedial Design'.

Attached, you will find the technical memorandum provided by our Technical Advisor (CC'ed here). Included in the memo are some of his technical comments on the LTMP (starting on page 12), and below you will find a summary of the Glynn Environmental Coalitions questions and concerns as well. We have also shared this information with our partners at One Hundred Miles (also CC'ed here) who share significant interest in the LTMP. They may share comments in addition to ours and have requested to be included in the future when informal requests for community input are provided. Please feel free to follow-up if you require any clarification or have questions about the summary below.

Questions:

- We understand that by using containment measures for certain areas of Operable Unit 1, a Five Year Review process will be started. Will the 5-year review process will include seafood sampling to continue to monitor potential human exposure to contaminants remaining in the estuary? Is it too soon to know that information?
- Are there any plans to monitor and sample Spartina Alterniflora (Smooth Cordgrass) for vertical migration of contaminants in the Thin-Layer Cover areas?

1. The timeline of monitoring should extend beyond 5 years. Due to the extremely complex nature of our marsh and estuarine ecosystem, paired with the vast extent of contamination, we find it hard to believe that noticeable change can be seen within the first five years post remediation. Especially regarding the remedial action objectives that aim to prevent human exposure through the ingestion of fish and shellfish. Our recommendation would be to extend the LTMP and subsequent individual monitoring schedules as detailed in Table 3 (as an example sampling taking place on Years 1, 3, and 5 could be extended to include 7, and 9, or Years 3 and 5 would then include 7 and 10, or whatever was deemed appropriate) to 10 years, if not beyond that. A shorter monitoring schedule could miss detectable levels of reductions in contamination and subsequent human exposure, which could prove the remedy ineffective. Whereas, a longer timeline could produce results in the later years that would indicate the remedy's effectiveness.
2. Any language regarding discontinuing monitoring before RAO's are met as is mentioned on page 24 (referenced below) should be removed. As referenced in the LTMP, the ROD states clearly that after the remedy has been implemented and monitored, the EPA can make a determination of whether or not a waiver is necessary due to the infeasibility of achieving limits within human health standards. Monitoring should persist as designed in the final LTMP and should not be allowed to be discontinued until it is complete. As mentioned earlier, a

shortened timeline and/or discontinuing monitoring leaves the opportunity for crucial information to be gathered around the effectiveness of this remedy. We believe that it is well understood that the effectiveness of this remedy will take a very long time to be seen, as indicated in the LTMP itself: "response in fish and shellfish tissue may take several years" – pages 23 and 24; "may take many years if not a few decades", pages 20 and 24.

   a. "Discontinuation of monitoring may occur earlier for some media or fish species than others, depending on attainment. If other elements of the remedy attain their respective CULs and standards but (for example) tissue concentrations do not, or if downward trends in tissue concentrations of mercury and Aroclor 1268 are delayed longer than anticipated."

3. Fish and shell fish monitoring should be expanded to include additional species and an increased number of samples per species. Ecological receptors, fiddler crabs and mummichogs, will have three composite samples from 7 locations for a total of 21 samples. Whereas the human health receptors, which are the bases for human health exposure to the local population, will only have three composite samples from two locations. This would total a mere **12 samples per species in year 3 and year 5**, a total of 24 samples over the 5 year period. This minimal level of sampling diminished the importance of trying to gauge the effectiveness of the remedy and it's ability to prevent human health exposure. The number of composite samples should be increased to at least 5 per location, and the number of locations should also be increased to include a location within Purvis Creek, Gibson Creek, and two locations within the Turtle River. Due to the extent and the severity of the contamination at this site, and it's implications on our local community's health, the PRP should be willing to take at least 100 fish and shell fish samples over the timeline of the monitoring of this remedy. It should be noted, as indicated previously, that we believe that the sampling period should be extended to at least 10 years. The likelihood of capturing the efficacy of the remedy at this level of sampling for only 5 years would seem to be extremely low.
4. Fish and shellfish species should include additional species that are under advisory: Red fish (Red drum), blue crab, flounder, spot, black drum, striped mullet, Atlantic croaker, and sheepshead. The species that are currently under 'Do Not Eat advisories' (Croaker, Spot, and Striped Mullet), indicating they have highest level of health risk, are not included in the long term monitoring plan. At a minimum, Blue crab should be included due to the heavy reliance our local community has on this species. As the sole entity with a dedicated on the ground contractor canvasing local fishing areas, we understand that blue crab is one of the most common species caught for subsistence in areas around the site. Blue crabs also represent a different class of animals (invertebrates compared to finfish) and ecosystem niche when compared to seatrout and kingfish.

Thank you again for the opportunity to share our thoughts and concerns regarding the LTMP. Please don't hesitate to let me know if you have any questions, comments, or require clarification.

Best,

Rachael Thompson
Executive Director
Glynn Environmental Coalition

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